

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC <i>et al.</i> , ¹)	Case No. 21-61491
)	(Jointly Administered)
Debtors.)	
)	Judge Russ Kendig

**NOTICE OF MOTION FOR ESTABLISHMENT OF APPLICABLE
HEARING DATES AND DEADLINES FOR PLAN OF LIQUIDATION**

PLEASE TAKE NOTICE THAT on February 25, 2022, the Squirrels Research Labs LLC, a debtor and debtor-in-possession (“Debtor”), in the above-captioned Chapter 11 cases, filed the *Motion For Establishment of Applicable Hearing Dates and Deadlines For Plan of Liquidation* (the “Motion”).

Your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

Pursuant to Local Rule 9013-1(b), if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then on or before **March 11, 2022**, you or your attorney must file with the Court a written objection explaining your position at:

United States Bankruptcy Court
Office of the Clerk
Ralph Regula Federal Building and U.S. Courthouse
401 McKinley Avenue, SW
Canton, Ohio 44702

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

You must also serve a copy of your request on the undersigned counsel:

Marc B. Merklin
Julie K. Zurn
Brouse McDowell LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311

*Counsel for the Debtors
and Debtors-in-Possession*

Pursuant to Local Rule 9013-1(d), if you or your attorney do not take these steps, the Court may grant the relief requested without conducting a hearing and without further notice to you.

Dated: February 25, 2022

Respectfully submitted,

/s/ Julie K. Zurn

Marc B. Merklin (0018195)
Julie K. Zurn (0066391)
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*Counsel for the Debtors
and Debtors-in-Possession*

CERTIFICATE OF SERVICE

I, Julie K. Zurn, hereby certify that on February 25, 2022, a true and correct copy of the *Notice of Motion For Establishment of Applicable Hearing Dates and Deadlines For Plan of Liquidation* was served via the court's Electronic Case Filing System on these entities and individual who are listed on the court's Electronic Mail Notice List:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC at
John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc. at
christopher.combest@quarles.com

John G. Farnan on behalf of Creditor Cincinnati Insurance Company at
jfarnan@westonhurd.com

Robert E. Goff, Jr. on behalf of Creditor Cincinnati Insurance Company at
rgoff@westonhurd.com, jroberts@westonhurd.com

Steven Heimberger on behalf of Interested Party SCEB, LLC at sheimberger@rlblp.com,
HeimbergerSR82735@notify.bestcase.com

Jeannie Kim on behalf of Interested Party Instantiation LLC at
JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com

Marc Merklin on behalf of Debtor Squirrels Research Labs LLC at
mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com

David M. Neumann on behalf of Creditor Envista Forensics, LLC d/b/a AREPA
dneumann@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com

David M. Neumann on behalf of Creditor Torea Consulting Ltd. at
dneumann@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com

Christopher Niekamp on behalf of Creditor Better PC, LLC at cniekamp@bdblaw.com

Paul J. Schumacher on behalf of Interested Party Ohio Power Company dba American
Electric Power at pschumacher@dmclaw.com, tgross@dmclaw.com

Frederic P. Schwieg at fschwieg@schwieglaw.com

Frederic P. Schwieg on behalf of Trustee Frederic P. Schwieg at
fschwieg@schwieglaw.com

Bryan Sisto on behalf of Creditor Carl Forsell at bsisto@fbtlaw.com

Richard J. Thomas on behalf of Creditor Premier Bank at
rthomas@hendersoncovington.com, dciambotti@hendersoncovington.com

Joshua Ryan Vaughan on behalf of Creditor Ohio Bureau of Workers Compensation at
jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com

Julie K. Zurn on behalf of Debtor Squirrels Research Labs LLC at
jzurn@brouse.com, tpalcic@brouse.com

Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee at
kate.m.bradley@usdoj.gov

And by regular U.S. Mail on February 25, 2022, on the following:

Instantiation LLC
c/o Jason R. Schendel
Sheppard, Mullin, Richter & Hampton LLP
4 Embarcadero Center, 17th Flr
San Francisco, CA 94111

/s/ Julie K. Zurn
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